



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

SM

August 24 2017

Certified Mail # 7016 2070 0000 5050 4063

Mr. Joseph Buffone
JBRL Development Corporation
PO Box 55
Yatesboro, PA 16263

RECEIVED

SEP 05 2017

**ICF International
PAUSTIF**

Re: Remedial Action Plan Addendum No. 2 - Approval
Storage Tank System Release: April 8, 2014
Facility ID No. 03-06500
USTIF Claim No. 2014-0036
Valley Village Keystone
10243 State Route 85
Cowanshannock Township, Armstrong County

Dear Mr. Buffone:

The Department of Environmental Protection (Department) has received and reviewed a report submitted by the Insite Group, Inc. (dated August 4, 2017) on your behalf, and has reviewed the Remedial Action Plan Addendum No. 2, regarding contamination resulting from a release of a regulated substance at the above-referenced facility.

The property has operated as a retail gasoline sales facility and convenience store since 1985. Fuel sales are supported by an Underground Storage Tank (UST) system comprised of two 6,000-gallon regular unleaded gas tanks and one 4,000-gallon premium unleaded gas tank that serve two dispenser islands. Site appurtenances include a canopy over the dispenser islands and a one-story building (with a basement) that houses the convenience store. The site is variously covered by concrete, asphalt, gravel and grassy areas. Public water and sewer service the site. The surrounding area is mixed open land, residential and commercial. Some strip mining has occurred in the vicinity.

Site characterization was started in March 2014 in response to the detection of strong petroleum odors and separate-phase liquids in the Tank 003 sump area during an upgrade of the tank system. Investigations included soil borings, installation of groundwater monitoring wells, laboratory analysis of soil and groundwater samples, sampling of soil gas, aquifer characterization, exposure pathway analysis, data interpretation remedial alternatives screening and report preparation. The results of the initial site characterization were provided in an SCR and were used to develop the remedial approach proposed in a RAP both of which were submitted in March 2015. The Department approved the original SCR/RAP (with modifications) in a letter dated July 6, 2015.

Additional site characterization and remedial action evaluation has been performed since the approval of the original SCR/RAP. This additional work was done in response to comments developed by the Underground Storage Tank Indemnification Fund (USTIF) third party reviewer. The additional work, the results of which are reported on in the SCR/RAP Addendum, involved the drilling of soil borings to delineate soil contamination areas, installation of three additional groundwater monitoring wells, the installation of two piezometers in the deeper groundwater zone, and the installation of an additional soil vapor sampling point near the site building. Also included in the site work was the performance of various pilot tests (e.g., bench scale testing of surfactants, testing of drain interconnection with the tank cavity, vacuum extraction from the tank cavity to determine possible yields, and dye trace tests to demonstrate interconnectivity between the tank cavity and the surrounding monitoring wells) to ascertain the applicability of a number of potential remedial approaches. The first RAP Addendum for this work was approved by the Department on August 24, 2016.

Site characterization has indicated that there are no exceedences of the Direct Contact Standards (DCS) in any of the soil samples.

The site monitoring wells have been sampled on numerous quarterly intervals. Groundwater monitoring in the shallow aquifer detected levels of benzene, ethylbenzene, MTBE, naphthalene, toluene, 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene above SHS (residential, used-aquifer) in downgradient wells during the groundwater sampling events. The contaminant plume extends some distance offsite.

Three soil vapor sampling points were installed in areas near the contaminated soils and groundwater and in a location along a possible preferential pathway (utility corridor) to the building. There were no exceedences of the applicable screening criteria detected in the soil vapor samples. An additional vapor sampling point has been established along a possible preferential pathway and this will be sampled in the future after intrusive remedial activities.

The initial remediation for the site commenced in August 2016, and included:

- A total of 1,919 tons of impacted soil was excavated and disposed of.
- A total of 160 pounds of RegenOx Part A was mixed in a slurry form and injected into the UST cavity. The mixture was extracted 3 weeks later.
- A total of 10,781 gallons of groundwater was extracted during excavation, and recycled/disposed.
- A PlumeStop® Colloidal Biomatrix and ORC® barrier was placed at the downgradient end of the excavation. This material is designed to stop movement of contaminants downgradient by binding them in place and to then provide an oxygen source for the enhanced biodegradation of the hydrocarbons.
- The sanitary sewer line was encountered during excavation, and a series of PVC risers, SL-1 through SL-6 were installed along the sewer line, to function as potential extraction points.

- An additional 160 pounds of RegenOx Part A was mixed in a slurry form and injected into the UST cavity.

The RAP Addendum No. 2 modifies some of the original remedial approach by the following:

- Additional treatment of the UST cavity to remove adsorbed phase contamination.
- Treatment of the sewer line backfill in the area of SL-3 and SL-4.
- Additional treatment of the dissolved phase plume in the area downgradient of the UST cavity, using Carbon Based Injectate (CBI) technology.

The Department approves the RAP Addendum No. 2 in accordance with 25 Pa. Code § 245.311(b)(1).

25 Pa. Code § 245.312(a) specifies that remedial action shall be implemented upon approval of the RAP according to the schedule contained in the RAP. Remedial action should, therefore, commence immediately upon receipt of this letter and proceed in accordance with the schedule in the RAP until the selected remediation standard is attained.

Remedial Action Progress Reports must be submitted to the Department in accordance with Section 245.312(b-d) by the 30th day of the month following the end of each quarter (October 30, January 30, April 30, July 30). The final RAPR is submitted as part of the Remedial Action Completion Report. Your first RAPR should be submitted no later than October 30, 2017.

Failure to implement remedial action or submit complete progress reports in accordance with the schedule outlined above may result in enforcement action by the Department. If you wish to modify any part of this RAP or select a new remediation standard, you must prepare and submit a new or modified RAP to the Department in accordance with Section 245.312(e).

Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, P.O. Box 8457, Harrisburg, PA 17105-8457, 717-787-3483. TDD users may contact the Board through the Pennsylvania Relay Service, 800-654-5984. Appeals must be filed with the Environmental Hearing Board within 30 days of receipt of written notice of this action unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedure may be obtained from the Board. The appeal form and the Board's rules of practice and procedure are also available in braille or on audiotape from the Secretary to the Board at 717-787-3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

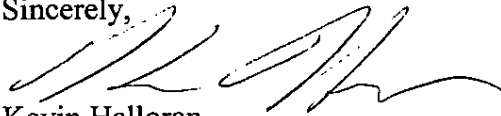
IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST REACH THE BOARD WITHIN 30 DAYS. YOU DO NOT NEED A LAWYER TO FILE AN APPEAL WITH THE BOARD.

IMPORTANT LEGAL RIGHTS ARE AT STAKE, HOWEVER, SO YOU SHOULD SHOW

THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD (717-787-3483) FOR MORE INFORMATION.

If you have questions, please contact Patricia Renwick of my staff 412-442-4082 or by email to prenwick@pa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'KH', is written over the word 'Sincerely,'.

Kevin Halloran
Environmental Program Manager
Environmental Cleanup & Brownfields Program

cc: ICF International, Inc. - Shane Marion
Insite Group, Inc. - Sara Giordano, Ph.D.